

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JOHN GACHAGO,
Plaintiff

v

BRISTOL MYERS SQUIBB, and
AMERICAN EXPRESS,
Defendants

CIVIL ACTION NO.

05-10141-RGS

FILED
CIVIL OFFICE

MAY 25 2005 12:53

U.S. DISTRICT COURT
DISTRICT OF MASS

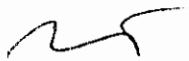
PLAINTIFF'S MOTION TO AMEND PLEADINGS

The facts of the case and the issues expressly and implicitly raised remain the same. The Plaintiff through Counsel asks the Court to allow amended pleading to more clearly state a claim for which relief may be granted.

The Plaintiff, Mr. Gachago filed the original Complaint "pro se" and as justice so requires the Plaintiff requests leave of Court to amend pleadings so Plaintiff has equal advantage of Counsel.

Mr. John Gachago,

By his attorney,



Doug Surprenant BBO # 651975
Law Office of Doug Surprenant
55 N. Franklin Street
Holbrook, MA 02343
(781) 767-9300
(781) 767-9303 (Fax)

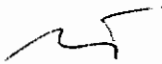
By U.S. Mail

NOTICE OF MOTION TO AMEND PLEADINGS

To: Eve Slattery

Please take notice that the undersigned will file a Motion to Amend Pleadings before the United States District Court for the District of Massachusetts on Wednesday May 25, 2005.

Dated: May 24, 2005




Doug Surprenant BBO # 651975
Law Office of Doug Surprenant
55 N. Franklin Street
Holbrook, MA 02343
(781) 767-9300
(781) 767-9303 (Fax)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the Plaintiff's Motion to Amend Pleadings was this day served upon all parties to this action by U.S. Mail, prepaid first class to all Attorneys of record.

SIGNED under the pains and penalties of perjury,

Dated: May 24, 2005



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NOTICE OF MOTION TO AMEND PLEADINGS

To: Paige Scott Reed

Please take notice that the undersigned will file a Motion to Amend Pleadings before the United States District Court for the District of Massachusetts on Wednesday May 25, 2005.

Dated: May 24, 2005



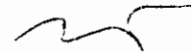
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